

STANDARDS OF CONDUCT
FOR COMMISSIONERS AND EMPLOYEES OF THE
MISSOURI HOUSING DEVELOPMENT COMMISSION

MHDC's POLICY OF SERVICE AND INTEGRITY

The commissioners and the employees of the Missouri Housing Development Commission hold their respective positions with MHDC as a public trust for the benefit of the people of the State of Missouri. Honesty, integrity, and a spirit of public service are the hallmarks of that trust. Accordingly, in all matters related to MHDC, its commissioners and employees are to conduct themselves in a manner that places duty to the people of Missouri, as the intended beneficiaries of MHDC's actions, above their own personal interests. Commissioners and employees of MHDC should avoid conflicts between their duties to MHDC and their own personal interests. Where the potential for such conflict exists, MHDC's commissioners and employees should identify such situations, disclose the potential conflict to the appropriate person or persons, and take whatever steps may be warranted by the situation, up to and including recusing themselves from decision-making or action pertaining to the situation.

PRINCIPLE PROVISIONS

1. Commissioners and employees shall comply with federal and state laws including specifically the provisions of Chapter 105, RSMo, and in particular, sections 105.450 through 105.496, RSMo., which govern the conduct of public officers and employees. Those sections are expressly incorporated within these standards of conduct by reference. To the extent any provisions in these standards of conduct conflicts or is inconsistent with a provision of Chapter 105, RSMo, commissioners and employees should adhere to Chapter 105, and will not violate these standards if they have complied with Chapter 105.
2. Commissioners and employees shall adhere to all laws providing equal opportunity to all citizens, clients of MHDC, and persons who do business with MHDC. Commissioners and employees shall not engage in any form of harassment or discrimination, including harassment or discrimination on the basis of race, color, religion, national origin, ancestry, sex, age or disability either at the workplace or in any context dealing with MHDC business.
3. Commissioners and employees shall conduct the business of MHDC in a manner which inspires public confidence and trust.

4. Commissioners and employees shall act impartially and neither dispense, nor accept special favors or privileges that improperly influence the performance of their official duties.
5. Commissioners and employees shall not improperly disclose confidential information gained by reason of their public position.
6. Commissioners and employees shall to the best of their ability protect and conserve MHDC property.
7. Commissioners and employees shall not knowingly engage in business with MHDC or state government, hold financial interests, or engage in outside employment when such actions are inconsistent with the conscientious performance of their official MHDC duties.
8. Commissioners and employees shall not attempt to improperly influence MHDC decisions in matters relating to prospective employers with whom employment has been accepted or is being negotiated.
9. Commissioners and employees shall not knowingly purchase or sell MHDC securities unless they comply completely with all federal and state securities law.
10. Commissioners and employees shall not knowingly invest in businesses that transact business with MHDC unless they fully disclose the nature of their investment and recuse themselves from any aspect of MHDC decision-making regarding the business in question.
11. Commissioners and employees shall not solicit, accept or retain any personal benefit, gift, favor, service, loan, fee, bribe, kickback or other compensation (collectively, "consideration") in exchange for taking any action or refraining from taking an action in their capacity as a commissioner or employee of MHDC.

Commissioners and employees may accept gifts of unsolicited items of de minimis market value or gifts that, from a reasonable person's standard, are clearly motivated by a family relationship or personal friendship between the giver and receiver, even if the giver has a business relationship with MHDC. However, this authorization is not an exception to the prohibition on receiving consideration in exchange for taking or refraining from taking an action in one's capacity as a commissioner or employee of MHDC.

With respect to travel related to MHDC business, commissioners and employees may accept payment of travel and lodging expenses and meals in connection with speaking engagements, conferences, conventions, association meetings, or similar functions if

accepting such payment is in the best interest of MHDC. Employees should disclose such arrangements to the executive director before their acceptance. However, this authorization is not an exception to the prohibition on receiving consideration in exchange for taking or refraining from taking an action in one's capacity as a commissioner or employee of MHDC.

12. Commissioners and employees who run for elective office may accept campaign contributions that are lawfully made, recorded and disclosed pursuant to applicable federal and state laws. However, this authorization is not an exception to the prohibition on receiving consideration in exchange for taking or refraining from taking an action in one's capacity as a commissioner or employee of MHDC.

13. Commissioners and employees shall file all financial disclosure statements required by law with the appropriate agencies who record such disclosures.

14. Commissioners and employees shall strive to avoid situations creating the appearance that they are violating any of the standards of conduct set forth in this document.

15. Commissioners who are unsure whether taking action or refraining from action would violate any of the standards set forth in this document should seek guidance from appropriate sources. Employees who are unsure whether taking action or refraining from action would violate any of the standards set forth in this document should disclose the potential conflict to the executive director and the general counsel and abide by the executive director's directive.

16. Commissioners who violate the standards set forth in this document may be subject to appropriate and lawful action by the Commission, and, if warranted, will be reported to the Missouri Ethics Commission and/or appropriate law enforcement authorities. Employees who violate the standards set forth in this document may be subject to appropriate and lawful action by their supervisors, the Commission, and, if warranted, will be reported to the Missouri Ethics Commission and/or appropriate law enforcement authorities.

CONTACT WITH COMMISSIONERS AND EMPLOYEES

For noncompetitive matters pending before the Commission, interested parties may have contact with the commissioners or employees, if necessary, without having to adhere to any formal MHDC disclosure process. MHDC requests that such parties be cognizant and respectful of the limited resources, including time, available to the commissioners and MHDC's employees.

For any matter pending before MHDC, competitive or noncompetitive, commissioners and employees may contact anyone, including interested parties or agents of interested parties, in the course of investigating the matter for the purpose of either making a recommendation to the Commission or gathering information in order to exercise their best judgment in voting on the matter.

However, if an interested party has submitted a proposal, application, bid or response to a solicitation, request, notice or invitation to do so, for a competitive matter pending before the Commission, and that party desires to communicate with a commissioner or employee after the published response deadline for the purpose of lobbying the interested party's proposal, application, bid or response, the interested party or anyone acting at their direction or on their behalf (collectively or severally, the "interested party") may do so only by complying with the disclosure policy contained herein. Within 24 hours of contacting a commissioner or employee, the interested party must file a written notice of the contact with MHDC. The written notice will include a written description of any oral communication from the interested party to the commissioner or employee, and the written notice will include copies of any written or recorded materials provided to the commissioner or employee. In addition, within 24 hours of filing the notice of contact with MHDC, the interested party will deliver, either in person, by facsimile, or electronic mail or through overnight courier, a copy of the notice (including any attachments) to each and every other party whose proposal, application, bid or response competes with the interested party's proposal, application, bid or response. Failure to file the notice with MHDC or failure to provide a copy of the notice filed with MHDC to any competitor may result in the disqualification of the interested party's proposal, application, bid or response, at the discretion of the Commission.

Furthermore, the period consisting of seven days prior to a scheduled Commission decision on a competitive matter shall be deemed the "quiet period." During the quiet period, interested parties shall refrain from initiating contact with commissioners to lobby their proposal, application, bid or response. Failure to honor the quiet period may, at the Commission's discretion, result in the disqualification of the interested party's proposal, application, bid or response.